

CAFO FACILITY INSPECTION REPORT

INSPECTOR(S): Glenn Sakamoto (USEPA, Region 9) And Ed Kashak (Regional Water Quality Control Board, Santa Ana Region)

REPORT PREPARED BY: Glenn Sakamoto, Environmental Scientist, USEPA, Region 9

FACILITY INFORMATION

CAG018001
NPDES NO.

GERBEN HETTINGA
OWNER NAME

GH DAIRY #1
FACILITY NAME

04/10/2013
INSPECTION DATE

Ex. 6 Personal Privacy (PP)

SANTA ANA RIVER
RECEIVING WATER

ONTARIO, CA 91762
OWNER CITY, STATE, ZIP

ONTARIO, CA 91762
FACILITY CITY, STATE, ZIP

GERBEN HETTINGA
OWNER CONTACT

GERBEN HETTINGA
FACILITY CONTACT

Ex. 6 Personal Privacy (PP)
OWNER PHONE NO.

909-606-6455
FACILITY PHONE NO.

INSPECTION TYPE

- (A1)
- (B2) EPA Type C
- (02)
- (03)

No - Was the inspection pre-announced?
Yes - Were potential violations noted during this inspection?
No - Was this a quality assurance-based inspection?
No - Were bioassay samples collected?
No - Were water quality samples collected?

INSPECTION SUMMARY

The overall Facility rating, on a 1 (Unreliable) to 5 (Very Reliable) scale, is 2 = Marginal.

The GH Dairy #1 has been rated "Marginal" due to the following reasons:

- Pond markers were not installed in all of the facility lagoons and catch basins.
- Engineered Waste Management Plan (EWMP) was not certified by an Engineer.
- Manure solids were applied to the fields with non-crop (sudan) grass.
- Lagoon berms contained burrow holes from rodent activity.
- Perimeter berms along Merrill Avenue and Grove Avenue contained burrow holes.
- Analyses of manure hauled offsite not conducted.

- Manifest of manure removal offsite not kept.
- Records (manifest) of mortality removal not kept.

EPA INSPECTION CHECKLIST

- Permit
- Records/Reports
- Facility Site Review
- Laboratories
- Compliance Schedules
- Operations & Maintenance
- Other (Explain): _____.

POTENTIAL VIOLATIONS

1. EWMP:

- General Permit Provisions VII.C.3a-b - the facility shall maintain all containment structures and fully implement the EWMP. Burrow holes were observed in the impoundment structures and perimeter berms of the facility.
- General Permit Provisions VII.C.3b - the EWMP was not certified by an Engineer.
- General Permit Provisions VII.C.3b - the EWMP was not fully implemented.
- General Permit Provisions VII.C.3b - depth markers were not installed in every impoundment (also referred to as lagoons/ponds/catch basins).

2. Operation & Maintenance (O&M):

- General Permit Attachment A, Standard Provision I.D.- the impoundment berms contained excessive burrow holes.
- General Permit Attachment A, Standard Provision I.D. - the perimeter berms along the facility fenceline (Merrill Avenue and Grove Avenue) contained excessive burrow holes.
- General Permit Attachment A, Standard Provision I.D. - the fields used to grow non-crop sudan grass contained excessive amounts of manure solids.

3. Reasonable Steps (Duty to Mitigate):

- General Permit Attachment A, Standard Provision I.C. – by applying excessive manure solids to its non-crop (sudan grass) fields and failure to manage the excessive burrow holes along its impoundment berms and facility perimeter berms, GH Dairy #1 failed to take all reasonable steps to minimize or prevent any discharge off site that has a reasonable likelihood of adversely affecting human health and the environment.

INSPECTION OBSERVATIONS

On April 10, 2013, Glenn Sakamoto (US EPA Inspector) and Ed Kashak (Regional Water Quality Control Board, Santa Ana Region Inspector) conducted a joint federal/state compliance evaluation inspection of the GH Dairy #1. This facility operation is covered under the Santa Ana Water Board Order No. R8-2007-0001 - 'General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) within the Santa Ana Region', NPDES General Permit No. (CAG018001) at GH Dairy #1.

On April 10, 2013, the inspectors met with Mr. Gerben Hettinga who provided the inspectors with preliminary review of files, a tour of the facility, and a closing conference. During the opening conference, inspectors determined that the EWMP had not been certified by an Engineer; hence, it had not been properly implemented.

The Facility is a ____ acre dairy with approximately 1200 milk cows, 1300 calves, 140 dry cows, and 800 heifers. Process water is generated at the milk barn and then pumped via a sump to 2 ponds and pasture fields. The corrals appeared well-graded with no excessive manure solids. The corrals are cleaned approximately every 3 months. Mr. Hettinga indicated to the inspectors that he had last cleaned, leveled, and topped his corrals with new dirt back in June 2012. The depth of the manure in the corrals averaged 2 to 4 inches on the day of the inspection.

Proceeding to the ponds, the inspectors observed numerous burrow holes from rodent activity along the berm surface. Mr. Hettinga indicated that he conducts weekly inspections of the berms and uses the "CAFO Weekly Storm Water Management Structure Inspection Log Sheets." At the time of the inspection, Mr. Hettinga did not have proper documentation of weekly inspections of his containment structures in each 24 hour period during storm events according to his Permit requirements. The ponds also lacked pond markers as required by the EWMP; however, they did contain adequate freeboard averaging 5 to 6 feet.

Inspectors observed manure solids which had been excessively applied to the non-crop pasture where Mr. Hettinga indicated he grows sudan grass. The Permit prohibits the application of manure solids to pastures not used to grow crops such as wheat and corn.

Manure is commonly hauled off site, but Mr. Hettinga did not have any manifests documenting the disposal. Furthermore, no manure analyses had been conducted as required by the Permit. Mr. Hettinga indicated that he was having difficulties locating a qualified certified laboratory to conduct his analyses. In addition, no records had been kept to document mortality disposal.

At the perimeter of the facility just outside the barbed wire fencing along Merrill Avenue and Grove Avenue, inspectors noted excessive burrow holes in the perimeter berm. The berm surface was constructed of very loose, weathered, and permeable sands.

ANNUAL REPORT REVIEW

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the EWMP in the RWQCB file?	Yes
Did the Facility have a copy of the Certified EWMP on-site and available for review?	Uncertified Copy provided
EWMP preparation date:	?
EWMP prepared by:	Nolte Associates, Inc.
Santa Ana RWQCB EWMP Acceptance date:	July 01, 2005
EWMP was certified by the Facility's Engineer/Consultant on:	Never Certified.

Ed Kashak indicated that he will coordinate with Mr. Hettinga on getting the EWMP certified and fully implemented.

NUTRIENT MANAGEMENT PLAN (NMP) REVIEW (IF APPLICABLE)

Did the Facility have a copy of the NMP on site and available for review?	N/A (No crops grown at Facility)
Date NMP was prepared:	N/A
NMP prepared by:	N/A
Santa Ana RWQCB NMP acceptance date:	N/A

The Facility does not apply manure, litter, or process wastewater to "croplands" under their ownership or operational control; therefore, the Facility is not required to develop, implement, and retain onsite a Nutrient Management Plan, as stated in Section VII.C.3.d of the Permit.